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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20054

APR 15 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of 73.202(b)) MM Docket No. 02- _____
Table of Allotments)
FM Broadcast Stations)
(Depoe Bay, OR; Garibaldi, OR;)
Cottage Grove; OR, Veneta, OR;)
and Toledo, OR))

To: John Karousos, Chief
Allocations Branch

PETITION FOR RULE MAKING

Alexandra Communications, Inc., licensee of station KDEP (FM), Depoe Bay, OR ("ACI"), Signal Communications, Inc., licensee of station KEUG (FM), Cottage Grove, OR ("SCI") and Agpal Broadcasting, Inc., licensee of station KPPT (FM), Toledo, OR ("ABI"), respectfully submit this **Petition for Rule Making** to amend Section 73.202 of the Commission's Rules as follows:

(1) Substitute channel 288A for channel 288C3 at Depoe Bay, OR, reallocate channel 288A to Garibaldi, OR and modify the license of KDEP (FM) to specify operation at Garibaldi, OR; and

(2) Substitute channel 288C3 for channel 288A at Cottage Grove, OR, reallocate channel 288C3 to Veneta, OR and modify the license of KEUG (FM) to specify operation at Veneta, OR; and

(3) Reallocate channel 264C2 from Toledo, OR to Depoe Bay, OR and modify the license of KPPT (FM) to specify operation at Depoe Bay, OR.

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Discussion

Amendment of the Commission's FM Rules, as requested, would result in a preferential arrangement of FM allotments. See Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88, 90 (1992). First, the requested changes would result in the provision of a "first local aural service" to two deserving communities, Garibaldi, OR, and Veneta, OR. See 47 USC 307(b).

Veneta, OR is an incorporated city with a population (2000 Census) of approximately 2,755 persons. See Appendix A. Veneta presently has no local aural broadcast service. Id. Likewise, Garibaldi is an incorporated city with a population (2000 Census) of 899 persons. Id. Garibaldi also has no local aural broadcast service. Id.

Moreover, the requested allotment changes would provide additional service to approximately 7,737 underserved persons. Id. Of these, some 159 persons would receive their 4th aural reception service. Id.

Furthermore, the requested allotment changes would not deprive any of the subject communities of local aural service; and no white, gray or underserved areas would be created. Id. ¹

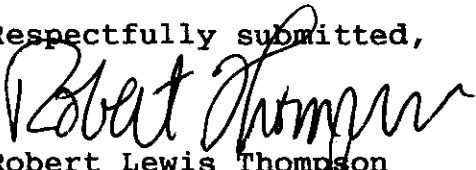
Finally, a total of 253,723 persons would receive an additional aural reception service if the requested changes are made.

¹ No "Tuck" analysis is required with respect to any of the proposed allotment changes. Id.

Attached hereto is an engineering report, which contains inter alia a channel separation study confirming that the requested channel substitutions and reallocations can be made consistent with the FCC's rules. See Appendix A.

Each of the Petitioners is committed to making the requested changes, if authorized, and promptly constructing the new facilities. See Appendix B.

Respectfully submitted,


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Counsel for Petitioners

April 12, 2002

Attachments

Appendix A

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AUSTRALIA

ENGINEERING STATEMENT

**PETITION FOR RULEMAKING TO
AMEND SECTION 73.202 OF THE RULES
AND REGULATIONS FOR THE FEDERAL
COMMUNICATIONS COMMISSION**

**TO ASSIGN FM CHANNEL 288A
FOR USE AT GARIBALDI, OREGON**

**TO ASSIGN FM CHANNEL 288C3
FOR USE AT VENETA, OREGON**

**TO ASSIGN FM CHANNEL 264C2
FOR USE AT DEPOE BAY, OREGON**

**ALEXANDRA COMMUNICATIONS, INC.
SIGNAL COMMUNICATIONS, INC.
AGPAL BROADCASTING, INC.**

3/2002

Engineering Statement

This Engineering Statement has been prepared on behalf of Alexandra Communications, Inc. ("Alexandra"), licensee of station KDEP 288C3 Depoe Bay; Signal Communications, Inc. ("Signal"), licensee of station KEUG 288A Cottage Grove; and Agpal Broadcasting, Inc. ("Agpal"), licensee of station KPPT 264C2 Toledo, in support of a Petition for Rulemaking to amend §73.202 of the Commission's Rules to:

- 1) Substitute Channel 288A for Channel 288C3 at Depoe Bay, reallocate Channel 288A to Garibaldi, and modify the license of station KDEP to specify operation at Garibaldi;
- 2) Substitute Channel 288C3 for Channel 288A at Cottage Grove, reallocate Channel 288C3 to Veneta, and modify the license of station KEUG to specify operation at Veneta, and;
- 3) Reallocate Channel 264C2 from Toledo to Depoe Bay, and modify the license of station KPPT to specify operation at Depoe Bay.

The proposed reallocation plan will provide several benefits:

- 1) KEUG will be able to upgrade to Class C3, and thus will be able to provide enhanced service to a broader listening area.
- 2) Veneta, an incorporated city with a 2000 Census population of 2,755 persons, will receive its first local service.

Hatfield & Dawson Consulting Engineers

- 3) Garibaldi, an incorporated city with a 2000 Census population of 899 persons, will receive its first local service.
- 4) A total of 253,723 persons will receive an additional aural service.
- 5) A total of 7,737 presently underserved persons will receive additional service. Of these, 159 persons will receive their 4th aural service, and 7,578 persons will receive their 5th aural service.

In accommodating the benefits listed above, no community will lose its only local service, and no white, gray, or underserved areas will be created.

KDEP Channel 288A at Garibaldi

As outlined in the attached channel study, Channel 288A can be assigned for use at Garibaldi in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments. For this study the coordinates of a hilltop site (NL 45° 27' 50" x WL 123° 56' 37") have been used. This site is 11 kilometers from Garibaldi, the coordinates of which are NL 45° 33' 36" x WL 123° 54' 35". The nominal distance to the 70 dBu F(50,50) contour for a Class A station is 16.2 kilometers. Therefore, this site will provide greater than 70 dBu coverage for all of Garibaldi.

The proposed allotment of Channel 288A at Garibaldi will provide the first local service to that community. Depoe Bay will retain full-time local service from the reallocation of station KPPT on Channel 264C2 to that community, as discussed below.

KEUG Channel 288C3 at Veneta

As outlined in the attached channel study, Channel 288C3 can be assigned for use at Veneta in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, presuming that Channel 288C3 at Depoe Bay is reallocated to Channel 288A at Garibaldi. For this study the coordinates of a hilltop site on Green Mountain (NL 44° 01' 56" x WL 123° 24' 19") have been used. This site is 5 kilometers from Veneta, the coordinates of which are NL 44° 02' 56" x WL 123° 20' 59". The nominal distance to the 70 dBu F(50,50) contour for a Class C3 station is 23.2 kilometers. Therefore, this site will provide greater than 70 dBu coverage for all of Veneta.

The proposed allotment of Channel 288C3 at Veneta will provide the first local service to that community. Cottage Grove will retain full-time local service from station KCGR on Channel 263A, and KNND on 1400 kHz.

KPPT Channel 264C2 at Depoe Bay

As outlined in the attached channel study, Channel 264C2 can be assigned for use at Depoe Bay in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments. For this study the coordinates of the licensed KPPT transmitter site (NL 44° 45' 23" x WL 124° 03' 01") have been used. This site is 6 kilometers from Depoe Bay, the coordinates of which are NL 44° 48' 31" x WL 124° 03' 43". The nominal distance to the 70 dBu F(50,50) contour for a Class C2 station is 32.6 kilometers. Therefore, this site will provide greater than 70 dBu coverage for all of Depoe Bay.

It should be noted that reallocation of Channel 264C2 from Toledo to Depoe Bay will not require any transmitter site change from the authorized operation of station KPPT.

The proposed allotment of Channel 264C2 at Depoe Bay will ensure the continued provision of local service to that community. Toledo will retain full-time local service from station KPPT 1230 kHz.

Gain and Loss Areas

The attached map Exhibit 1 depicts the extents of the loss and gain areas associated with the proposed reallocation plan.

The reallocation of Channel 288A Cottage Grove to Channel 288C3 Veneta will involve a transmitter site change. The gain area will encompass 3,818 km² and a 2000 Census population of 233,453 persons. The loss area will encompass 1,529 km² and a 2000 Census population of 15,454 persons.

The reallocation of Channel 288C3 Depoe Bay to Channel 288A Garibaldi will involve a transmitter site change. The gain area will encompass 1,266 km² (land area) and a 2000 Census population of 20,270 persons. The loss area will encompass 2,405 km² (land area) and a 2000 Census population of 41,692 persons.

The reallocation of Channel 264C2 Toledo to Channel 264C2 Depoe Bay will not involve a transmitter site change, and therefore will not involve any loss or gain areas.

Taken as a whole, the proposed reallocation plan will result in a gain area encompassing 5,084 km² and a 2000 Census population of 253,723 persons, and a loss area encompassing 5,914 km² and a 2000 Census population of 57,146 persons (all of whom would remain well-served). The attached table and map exhibit depict the gain and loss areas associated with this proposal.

Table of Gain and Loss Areas

Channel	Land Area and Population Served	
A. Cottage Grove 288A	2,519 km ²	64,888 persons
B. Veneta 288C3	4,808 km ²	282,887 persons
C. Depoe Bay 288C3	2,405 km ²	41,692 persons
D. Garibaldi 288A	1,266 km ²	20,270 persons
E. Cottage Grove 288A and Veneta 288C3 Common Area	990 km ²	49,434 persons
F. Depoe Bay 288C3 and Garibaldi 288A Common Area	zero km ²	zero persons
Total Loss Area equals (A - E) + (C - F)	5,914 km ²	57,146 persons
Total Gain Area equals (B - E) + (D - F)	5,084 km ²	253,723 persons

White, Gray, and Underserved Area Analysis

The proposed reallocation plan will not result in the creation of any white, gray, or underserved areas.

Cottage Grove Loss Area: All of the loss area associated with the reallocation of Channel 288A Cottage Grove to Channel 288C3 Veneta is considered to be well-served. Each of the following stations provides 60 dBu service to 100% of the Cottage Grove Channel 288A loss area¹:

KLCC-FM	209C	Eugene
KWAX-FM	216C1	Eugene
KKNU-FM	226C	Springfield-Eugene
KMGE-FM	233C1	Eugene
KZEL-FM	241C	Eugene
KNRQ-FM	250C	Eugene
KODZ-FM	256C	Eugene
KEHK-FM	272C1	Brownsville

Additional service to the Cottage Grove loss area is provided by numerous AM and FM stations.

A list of those stations can be provided should the Commission so require.

¹In determining reception service provided by FM stations, the area of service circumscribed by the station's 1.0 mV/m signal contour was considered, assuming 1) actual facilities for non-commercial stations operating on reserved channels, 2) maximum facilities for the class of station for stations (other than Class C stations) operating on non-reserved channels, and 3) minimum or existing Class C facilities, whichever is greater, for Class C stations. For clear channel Class A AM stations, the service area was defined by the station's 0.5 mV/m groundwave contour, based on its licensed facilities. For all other classes of full-time AM stations, reception service was defined as that service received within a station's nighttime interference-free contour.

Veneta Gain Area: All of the gain area associated with the reallocation of Channel 288A Cottage Grove to Channel 288C3 Veneta is considered to be well-served. Each of the following stations provides 60 dBu service to 100% of the Veneta Channel 288C3 gain area:

KLCC-FM	209C	Eugene
KKNU-FM	226C	Springfield-Eugene
KZEL-FM	241C	Eugene
KNRQ-FM	250C	Eugene
KODZ-FM	256C	Eugene

Additional service to the Veneta gain area is provided by numerous AM and FM stations. A list of those stations can be provided should the Commission so require.

Depoe Bay Loss Area: All of the loss area associated with the reallocation of Channel 288C3 Depoe Bay to Channel 288A Garibaldi is considered to be well-served. Each of the following stations provides 60 dBu service to 100% of the Depoe Bay Channel 288C3 loss area:

KNCU-FM	224C3	Newport
KSND-FM	236C2	Lincoln City
KCRF-FM	244C1	Lincoln City
KSHL-FM	248C2	Gleneden Beach
KPPT-FM	264C2	Toledo (to change to Depoe Bay)
KYTE-FM	274C1	Newport

Additional service to the Depoe Bay loss area is provided by numerous AM and FM stations. A list of those stations can be provided should the Commission so require.

Garibaldi Gain Area: The allotment of Channel 288A at Garibaldi will not provide service to any white or gray areas. KTEL-FM 231C3 Tillamook and KEX-AM 1190 kHz Portland each provide service to 100% of the gain area. However, the allotment of Channel 288A at Garibaldi

will provide additional service to some currently underserved areas: The following stations provide service to portions of the Garibaldi Channel 288A gain area:

KOPB-FM	218C	Portland
KGON-FM	222C	Portland
KAST-FM	225C1	Astoria
KPDQ-FM	229C	Portland
KTIL-FM	231C3	Tillamook
KCBZ-FM	235C3	Cannon Beach
KSND-FM	236C2	Lincoln City
KXJM-FM	238C	Portland
Vacant	242A	Bay City
KCRF-FM	244C1	Lincoln City
KKSN-FM	246C	Portland
KSHL-FM	248C2	Gleneden Beach
KCYS-FM	251A	Seaside
KUPL-FM	254C1	Portland
KWJJ-FM	258C1	Portland
KRKT-FM	260CØ	Albany
KKRZ-FM	262C	Portland
KPPT-FM	264C2	Toledo (to change to Depoe Bay)
KUFO-FM	266C	Portland
KINK-FM	270C	Portland
KCRX-FM	272C3	Seaside
KYTE-FM	274C1	Newport
KKCW-FM	277C	Beaverton
KRSK-FM	286C1	Molalla
KLTH-FM	294C	Lake Oswego
KVMX-FM	298C1	Banks
KEX-AM	1190 kHz	Portland (Class A)
KMBD-AM	1590 kHz	Tillamook (NIF = 6.3 mV/m)

The attached map Exhibit 4 depicts the Garibaldi gain area and the contours of the stations listed above. Numerals indicate the number of existing services in the underserved areas. The following table lists the areas and populations in the underserved portion of the gain area which will receive additional service:

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Number of Existing Services	Land Area and Population
3	9 km ² 159 persons
4	179 km ² 7,578 persons

No "Tuck" Analysis is Required

Veneta is not located within any Urbanized Area, and the allotment of Channel 288C3 at Veneta will provide 70 dBu service to only 31% of the Eugene-Springfield Urbanized Area. Therefore, a "Tuck" analysis is not required in support of the Veneta aspect of the proposed reallocation plan.

Garibaldi is not located within any Urbanized Area, and the allotment of Channel 288A at Garibaldi will not provide 70 dBu service to any Urbanized Area. Therefore, a "Tuck" analysis is not required in support of the Garibaldi aspect of the proposed reallocation plan.

Depoe Bay is not located within any Urbanized Area, and the allotment of Channel 264C2 at Depoe Bay will not provide 70 dBu service to any Urbanized Area. Therefore, a "Tuck" analysis is not required in support of the Depoe Bay aspect of the proposed reallocation plan.

SEARCH PARAMETERS

FM Database Date: 020312

Channel: 288A 105.5 MHz

Page 1

Latitude: 45 27 50

Longitude: 123 56 37

Safety Zone: 50 km

Job Title: GARIBALDI 288A ALLOTMENT SITE

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KCBZ	CANNON BEACH		235C3	1.700	45-57-27	8.8	55.53	12
CP MOD	OR	BMPH-010208AAV	94.9	378.0	123-50-01	SS	43.53	CLEAR
KCBZ	CANNON BEACH		235C3	16.000	45-56-44	359.4	53.54	12
APP	OR	BPH-020227ACX	94.9	107.0	123-57-04	SS	41.54	CLEAR
K285DN	CANNON BEACH		285D	0.060	45-52-42	359.0	46.07	0
LIC	OR	BLFT-880909TC	104.9	88.0	123-57-15		0.00	TRANS
RSV	MOLALLA		286C	0.000	45-00-35	111.3	135.80	95
	OR	RM-10072	105.1	0.0	122-20-17		40.80	CLEAR
KRSK	MOLALLA		286C1	64.000	45-29-20	87.9	97.72	75
CP MOD	OR	BMPH-011022AAU	105.1	361.0	122-41-40		22.72	CLEAR
KRSK	MOLALLA		286C1	22.500	45-31-21	85.6	93.86	75
APP	OR	BMPH-011227AAL	105.1	470.0	122-44-45	SS	18.86	CLEAR
KRSK	MOLALLA		286C	100.000	45-00-35	111.3	135.80	95
APP	OR	BMLH-011015AGT	105.1	576.0	122-20-17		40.80	CLEAR
KRSK	SALEM		286C	100.000	45-00-35	111.3	135.80	95
LIC	OR	BMLH-990521KA	105.1	576.0	122-20-17		40.80	CLEAR
KRSKaux	SALEM		286C	100.000	45-00-35	111.3	135.80	0
LIC	OR	BXLH-000623AFC	105.1	516.0	122-20-17		0.00	AUX
KDEP	DEPOE		288C3	3.600	44-45-24	185.9	79.02	142
LIC	OR	BLH-010419AAT	105.5	269.0	124-02-50		-62.98	SHORT
K288DI	LINCOLN CITY		288D	0.050	44-52-30	182.7	65.52	0
LIC	OR	BLFT-860516TC	105.5	300.0	123-59-00		0.00	TRANS
K288EC	SWEET HOME		288D	0.050	44-29-02	135.0	152.97	0
LIC	OR	BLFT-871229TG	105.5	923.0	122-34-55		0.00	TRANS
KLYK	LONGVIEW		288A	0.700	46-09-52	46.9	115.07	115
LIC	WA	BLH-941228KE	105.5	262.0	122-51-13	SS	0.07	CLOSE
KLYKaux	LONGVIEW		288A	0.320	46-09-52	46.9	115.07	0
CP	WA	BXPH-010213ABS	105.5	252.0	122-51-13		0.00	AUX

SEARCH PARAMETERS

FM Database Date: 020312

Channel: 288A 105.5 MHz

Page 2

Latitude: 45 27 50

Longitude: 123 56 37

Safety Zone: 50 km

Job Title: GARIBALDI 288A ALLOTMENT SITE

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
K289AC LIC	NEDONNA BEACH OR	BLFT-010424ABK	289D 105.7	0.010 501.0	45-44-38 123-56-24	0.5	31.12 0.00	0 TRANS
DEL	SOUTH BEND WA	RM-9369	289C2 105.7	0.000 0.0	46-41-44 123-46-17	5.5	137.55 31.55	106 CLEAR
KJET LIC	SOUTH BEND WA	BLH-990804KC	289C2 105.7	14.000 290.0	46-41-44 123-46-17	5.5	137.55 31.55	106 CLEAR
KJET CP MOD	SOUTH BEND WA	BMPH-980911IL	289C2 105.7	14.000 290.0	46-41-44 123-46-17	5.5 SS	137.55 31.55	106 CLEAR
KSTE-FM VAC	VANCOUVER WA	-	290C1 105.9	0.000 0.0	45-27-08 122-32-47	90.2	109.30 34.30	75 CLEAR
KSTE-FM CP MOD	VANCOUVER WA	BMPH-000530ACA	290C2 105.9	4.400 470.0	45-31-21 122-44-45	85.6	93.86 38.86	55 CLEAR
KSTE-FM APP	VANCOUVER WA	BPH-011228AAS	290C1 105.9	22.500 470.0	45-31-21 122-44-45	85.6 SS	93.86 18.86	75 CLEAR
KSTeaux APP	VANCOUVER WA	BXPH-011213AAL	290C2 105.9	1.700 424.0	45-31-21 122-44-45	85.6	93.86 0.00	0 AUX
KLOOaux LIC	CORVALLIS OR	BLH-820806AL	291C 106.1	27.500 -20.0	44-33-25 123-16-22	152.2	113.82 0.00	0 AUX

===== BEGINNING SEARCH OF SECONDARY DATABASE =====

KDEP PRM	GARIBALDI OR	-	288A 105.5	0.000 0.0	45-27-50 123-56-37	0.0	0.00 -115.00	115 SHORT
KEUG PRM	VENETA OR	-	288C3 105.5	0.000 0.0	44-01-56 123-24-19	164.9	164.71 22.71	142 CLEAR

===== END OF FM SPACING STUDY FOR CHANNEL 288 =====

SEARCH PARAMETERS

FM Database Date: 020312

Channel: 288C3 105.5 MHz

Page 1

Latitude: 44 1 56

Longitude: 123 24 19

Safety Zone: 50 km

Job Title: VENETA 288C3 ALLOTMENT SITE

Call Status	City St	FCC File No.	Channel Freq.	ERP(kw) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
RSV	MOLALLA OR	RM-10072	286C 105.1	0.000 0.0	45-00-35 122-20-17	37.5	137.83 41.83	96 CLEAR
KRSK APP	MOLALLA OR	BMLH-011015AGT	286C 105.1	100.000 576.0	45-00-35 122-20-17	37.5	137.83 41.83	96 CLEAR
KRSK LIC	SALEM OR	BMLH-990521KA	286C 105.1	100.000 576.0	45-00-35 122-20-17	37.5	137.83 41.83	96 CLEAR
KRSKaux LIC	SALEM OR	BXLH-000623AFC	286C 105.1	100.000 516.0	45-00-35 122-20-17	37.5	137.83 0.00	0 AUX
KEUG LIC	COTTAGE GROVE OR	BMLH-011203AWE	288A 105.5	5.200 105.0	43-46-41 123-02-33	134.1	40.58 -101.42	142 SHORT
KDEP LIC	DEPOE OR	BLH-010419AAT	288C3 105.5	3.600 269.0	44-45-24 124-02-50	327.9	95.37 -57.63	153 SHORT
NOTE: TO MOVE TO GARIBALDI 288A PER THIS PROPOSAL								
K288DI LIC	LINCOLN CITY OR	BLFT-860516TC	288D 105.5	0.050 DA 300.0	44-52-30 123-59-00	334.1	104.34 0.00	0 TRANS
K288CP LIC	MERLIN OR	BLFT-840103ML	288D 105.5	0.050 DA 449.0	42-28-17 123-18-12	177.2	173.60 0.00	0 TRANS
K288CW LIC	ROSEBURG OR	BLFT-850819TJ	288D 105.5	0.010 251.0	43-12-10 123-22-59	178.9	92.17 0.00	0 TRANS
K288EC LIC	SWEET HOME OR	BLFT-871229TG	288D 105.5	0.050 DA 923.0	44-29-02 122-34-55	52.3	82.72 0.00	0 TRANS
KQAK CP	BEND OR	BPH-000414ACF	289C1 105.7	40.000 180.0	44-04-40 121-19-49	87.5	166.36 22.36	144 CLEAR
KQAK LIC	BEND OR	BMLH-010522AAO	289C1 105.7	40.000 180.0	44-04-40 121-19-49	87.5	166.36 22.36	144 CLEAR
KYSJ LIC	COOS BAY OR	BLH-010104AAQ	290C2 105.9	15.000 275.0	43-27-49 124-05-44	221.5	84.16 28.16	56 CLEAR

SEARCH PARAMETERS

FM Database Date: 020312

Channel: 288C3 105.5 MHz

Page 2

Latitude: 44 1 56

Longitude: 123 24 19

Safety Zone: 50 km

Job Title: VENETA 288C3 ALLOTMENT SITE

Call Status	City St	FCC File No.	Channel Freq.	ERP(kw) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KLOOaux LIC	CORVALLIS OR	BLH-820806AL	291C 106.1	27.500 -20.0	44-33-25 123-16-22	10.2	59.26 0.00	0 AUX

===== BEGINNING SEARCH OF SECONDARY DATABASE =====

KDEP PRM	GARIBALDI OR -		288A 105.5	0.000 0.0	45-27-50 123-56-37	345.2	164.71 22.71	142 CLEAR
KEUG PRM	VENETA OR -		288C3 105.5	0.000 0.0	44-01-56 123-24-19	0.0	0.00 -153.00	153 SHORT

===== END OF FM SPACING STUDY FOR CHANNEL 288 =====

SEARCH PARAMETERS

FM Database Date: 020312

Channel: 264C2 100.7 MHz

Page 1

Latitude: 44 45 23

Longitude: 124 3 1

Safety Zone: 50 km

Job Title: DEPOE BAY 264C2 ALLOTMENT SITE

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
K210CW CP MOD OR	NEWPORT OR	BMPFT-000412AAM	210D 89.9	0.050 230.0	44-40-34 124-02-31	175.8	8.95 0.00	0 TRANS
980826MLS CP	SALEM OR	BPED-980826ML	211A 90.1	0.560 39.0	44-45-33 123-13-34	89.4	65.26 50.26	15 CLEAR
KKRZ LIC	PORTLAND OR	BLH-870206KB	262C 100.3	100.000 437.0	45-31-22 122-45-07	49.6	132.98 27.98	105 CLEAR
KKRZ CP	PORTLAND OR	BPH-991019AAH	262C 100.3	100.000 470.0	45-31-21 122-44-45	49.8	133.33 28.33	105 CLEAR
KKRZaux APP	PORTLAND OR	BXPH-011214AAI	262C 100.3	40.000 409.0	45-31-21 122-44-45	49.8	133.33 0.00	0 AUX
KCGR LIC	COTTAGE GROVE OR	BLH-940404KO	263A 100.5	6.000 35.0	43-44-41 123-05-29	145.5	136.02 30.02	106 CLEAR
K263AF LIC	SWEET HOME OR	BLFT-970909TF	263D 100.5	0.040 313.0	44-26-07 122-42-26	108.1	112.45 0.00	0 TRANS
KMGX LIC	BEND OR	BLH-5892	264C1 100.7	50.000 158.0	44-04-40 121-19-49	108.3	229.38 5.38	224 CLOSE
NEW APP	CANNON BEACH OR	BNPL-010615BDL	264L1 100.7	0.100 -45.6	45-53-31 123-57-37	3.2	126.40 0.00	0 LPFM
K264AA LIC	CORVALLIS, ETC. OR	BLFT-930316TA	264D 100.7	0.020 421.0	44-38-45 123-16-13	101.0	63.03 0.00	0 TRANS
KPPT-FM LIC	TOLEDO OR	BLH-011204ABC	264C2 100.7	17.500 255.0	44-45-23 124-03-01	0.0	0.00 -190.00	190 SHORT

SEARCH PARAMETERS

FM Database Date: 020312

Channel: 264C2 100.7 MHz

Page 2

Latitude: 44 45 23

Longitude: 124 3 1

Safety Zone: 50 km

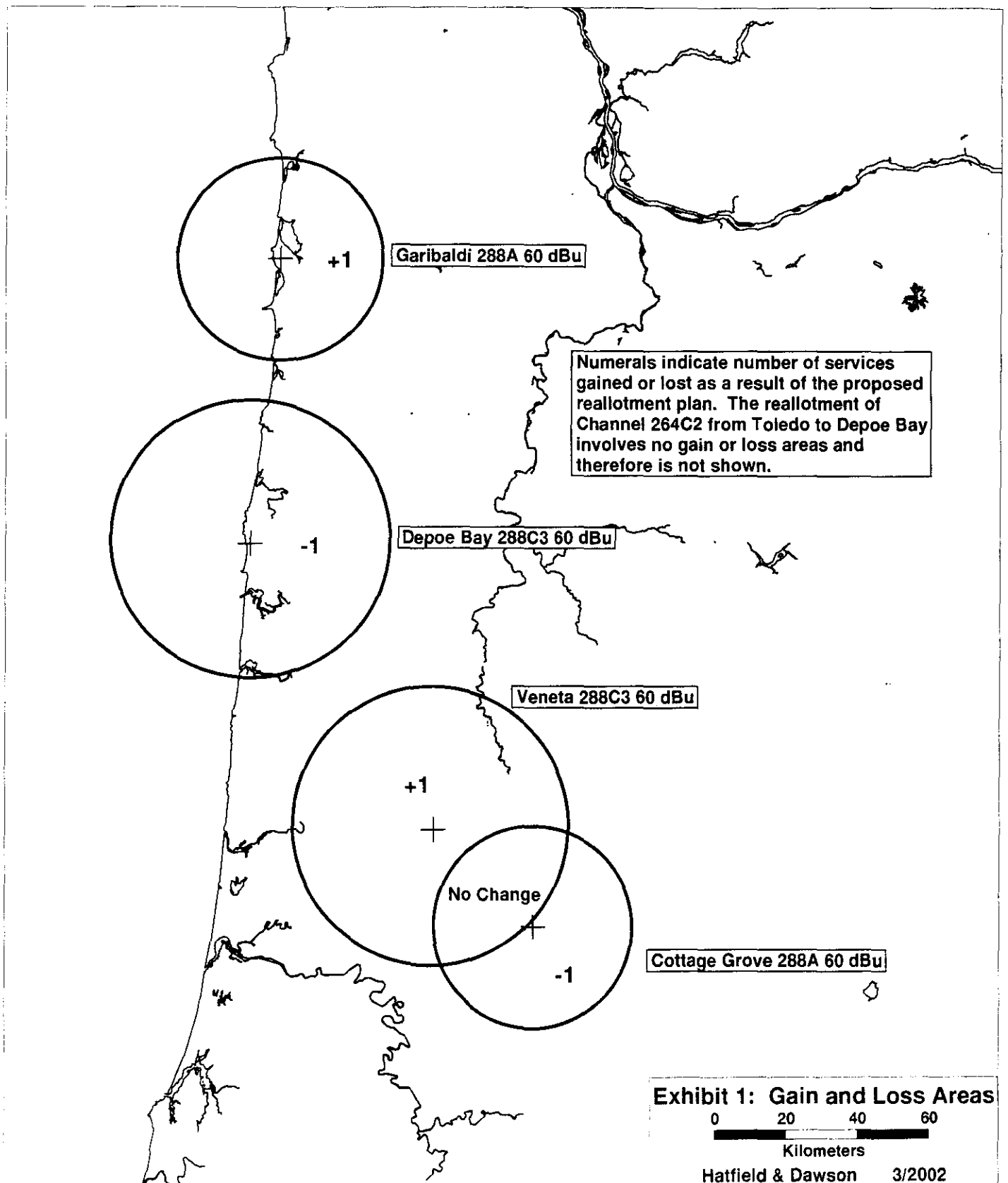
Job Title: DEPOE BAY 264C2 ALLOTMENT SITE

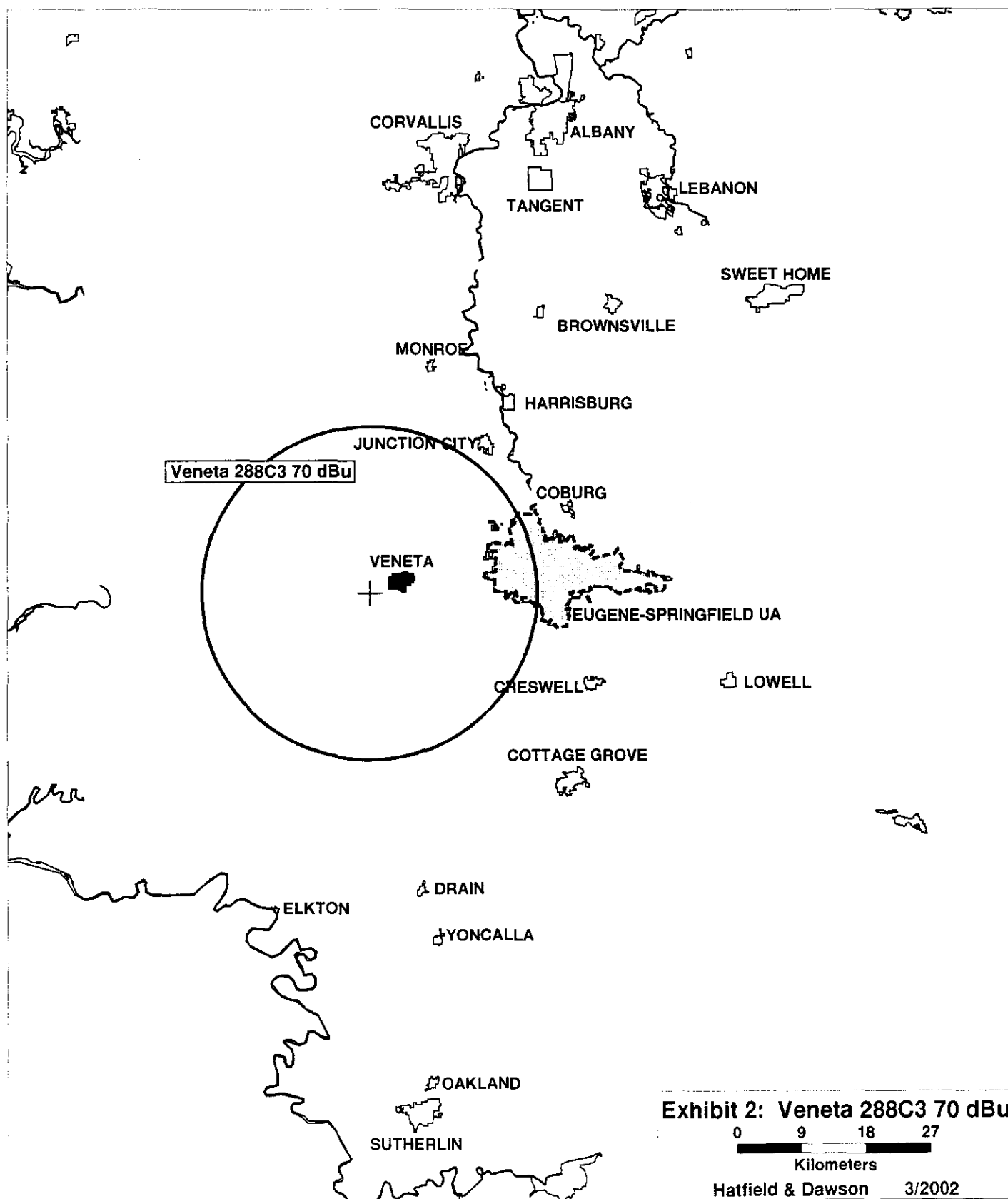
Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
K230AD LIC	COTTAGE GROVE OR	BLFT-921211TC	265D 100.9	0.250 288.0	43-46-38 123-02-33	143.3	135.33 0.00	0 TRANS
K265DF LIC	EUGENE OR	BLFT-950626TA	265D 100.9	0.020 316.0	44-00-07 123-06-53	138.1	112.19 0.00	0 TRANS
K265AB LIC	FLORENCE OR	BLFT-921211TB	265D 100.9	0.240 261.0	43-57-24 124-04-24	181.2	88.88 0.00	0 TRANS
KUFO-FM LIC	PORTLAND OR	BLH-970630KE	266C 101.1	100.000 440.0	45-30-58 122-43-59	50.3	133.66 28.66	105 CLEAR
KUFOaux LIC	PORTLAND OR	BLH-970715KE	266C 101.1	22.500 395.0	45-30-57 122-43-52	50.3	133.76 0.00	0 AUX

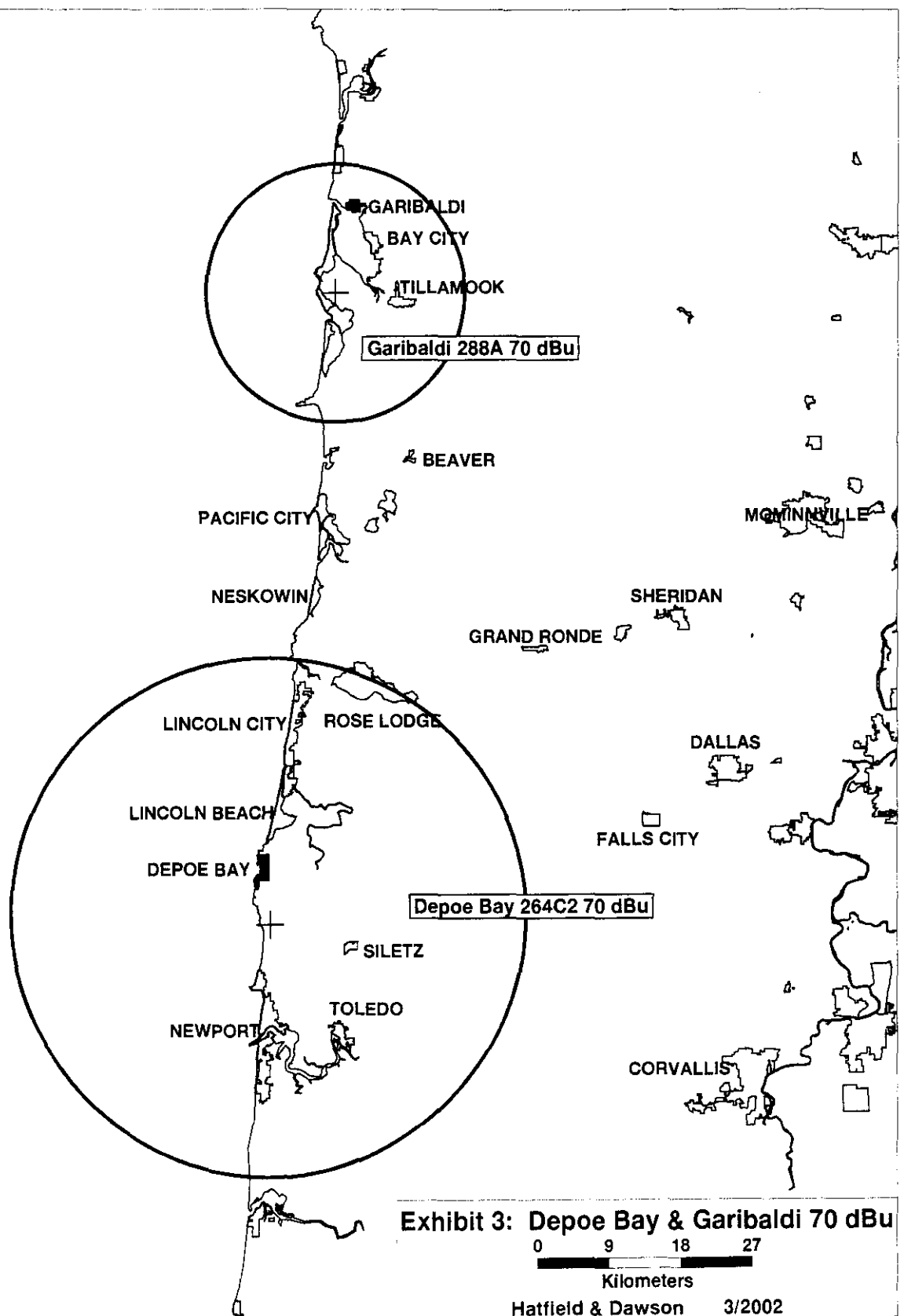
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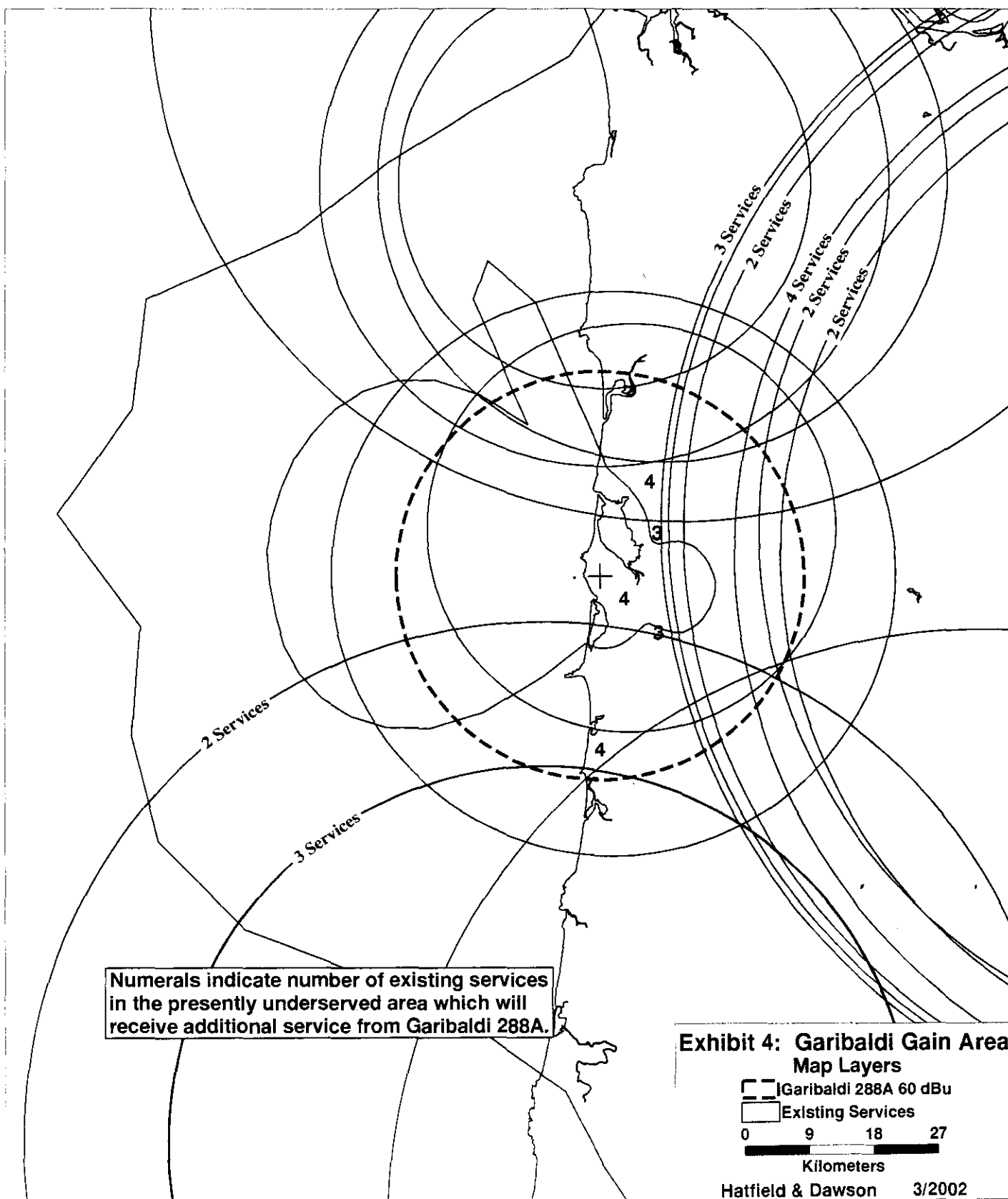
KPPT PRM	DEPOE BAY OR -		264C2 100.7	17.500 255.0	44-45-23 124-03-01	0.0	0.00 -190.00	190 SHORT
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===== END OF FM SPACING STUDY FOR CHANNEL 264 =====





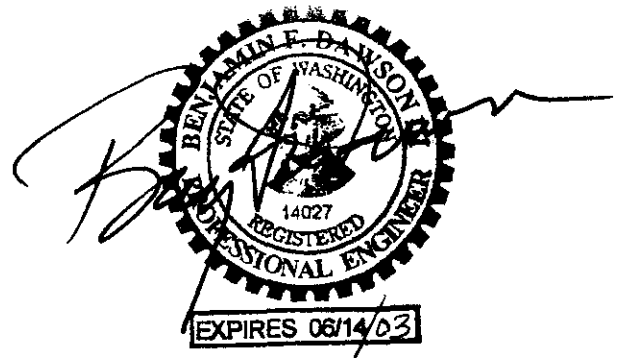




Statement of Engineer

This Engineering Statement supporting a Petition for Rulemaking to revise the Table of Allotments at Cottage Grove, Depoe Bay, Garibaldi, Toledo, and Veneta, Oregon, has been prepared by Erik C. Swanson, EIT, under my direct supervision. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

Signed this 25th day of March, 2002.



Benjamin F. Dawson III, P.E.

Hatfield & Dawson Consulting Engineers

Appendix B

Sworn Declaration

My name is Thomas D. Hodgins and I am president of Alexandra Communications, Inc. ("ACI"), licensee of station KDEP (FM), Depoe Bay, OR. I have read and I authorize the filing of the foregoing Petition for Rulemaking, involving KEUG (FM), KDEP (FM), KPPT (FM) et al. If the Petition is granted and the requested allotment changes are authorized by the FCC, then ACI will promptly file an application to construct KDEP (FM)'s new Class A facility at Garibaldi, OR, its new community of license.

Executed under penalty of perjury on April 4, 2002.

Alexandra Communications, Inc.

BY:


Thomas D. Hodgins, President

Sworn Declaration

My name is BERNARD Foster. I am president of Signal Communications, Inc. ("SCI"), licensee of station KEUG (FM), Cottage Grove, OR. I have read and I authorize the filing of the foregoing Petition for Rulemaking, involving KEUG (FM), KDEP (FM), KPPT (FM) et al. If the Petition is granted and the requested allotment changes are authorized by the FCC, then SCI will promptly file an application to construct KEUG (FM)'s new FM facility at Veneta, OR, its new community of license.

Executed under penalty of perjury on April 8, 2002.

Signal Communications, Inc.

BY:

Bernard Foster

Sworn Declaration

My name is ANDREW HASLE and I am PRES. of Agpal Broadcasting, Inc. ("ABI"), licensee of station KPPT (FM), Toledo, OR. I have read and I authorize the filing of the foregoing Petition for Rulemaking, involving KEUG (FM), KDEP (FM), KPPT (FM) et al. If the Petition is granted and the requested allotment changes are authorized by the FCC, then ABI will promptly seek to modify KPPT (FM)'s license to specify Depou Bay as its community of license.

Executed under penalty of perjury on APRIL 2 ~~MARCH~~, 2002.

A71

Agpal Broadcasting, Inc.

BY: 